

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL No. 3:16-md-02738-MAS-RLS

**JUDGE MICHAEL A. SHIPP
MAG. JUDGE RUKHSANAH L. SINGH**

ROSA MONICA SERNA MEDINA,

Plaintiff,

v.

JOHNSON & JOHNSON, JOHNSON
& JOHNSON CONSUMER, INC.
F/K/A JOHNSON & JOHNSON
CONSUMER COMPANIES, INC.,

Defendants.

Civil Action No.: 3:19-cv-21076

RESPONSE TO AUGUST 15, 2024 ORDER TO SHOW CAUSE (DKT. 33096)

Melanie Meneses Palmer of Kiesel Law LLP, counsel of record for Plaintiff Rosa Monica Serna Medina (hereinafter, “Plaintiff”), submits the following Response to the Court’s August 15, 2024 Order to Show Cause Why Cases on the Attached Exhibit A Should Not Be Dismissed With Prejudice (Dkt. 33096).

On December 4, 2019, a Complaint was directly filed on behalf of Plaintiff in MDL No. 2738. Pursuant to the September 1, 2023 Amended Plaintiff’s Profile Form (“PPF”) Order, a Plaintiff Profile Form, core records, and signed medical records authorizations were required to be served upon Defendants via MDL Centrality by a certain date. Counsel for Plaintiff made several attempts to contact Plaintiff to obtain the necessary information and documents to comply with the Court’s September 1, 2023 Amended PPF Order. Unfortunately, Counsel lost contact with Plaintiff

during the two-year bankruptcy stay. Despite multiple contact attempts via U.S. Mail, phone, and email, Plaintiff did not return a completed PPF with all core records to Counsel for filing.

However, just recently, Counsel was able to communicate with Plaintiff regarding the non-filing of the PPF and Plaintiff indicated she would return the completed PPF to Counsel for submission. Thus, Counsel seeks a 45-day extension to upload and produce the PPF and respectfully asks the Court not to dismiss Plaintiff's Complaint with prejudice.

DATED: September 5, 2024

Respectfully Submitted,

KIESEL LAW LLP

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Dated: September 5, 2024

Respectfully Submitted,

By: /s/ Melanie Meneses Palmer

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